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7 Hon. Richard A. Jones
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9 UNITED STATES DISTRICT COURT
10 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

11 JENNIFER and EUGENE WONG, for themselves
12 and as parents of Student JW, a minor,

No. C16-1774 RAJ

13 Plaintiffs,

14 v.
15
16 SECOND DECLARATION OF DAVID
17 SEATTLE SCHOOL DISTRICT NO. 1,
18 HOKIT IN SUPPORT OF
19 Defendant.
20 DEFENDANT'S MOTION FOR
21 PARTIAL SUMMARY JUDGMENT

22 David Hokit declares and states as follows:

23 1. **Declarant.** I am the attorney for Seattle Public Schools (District) in the above-
24 captioned matter. I am over the age of 18 and competent to testify to the matters stated in this
25 declaration. I make this second declaration based on my own personal knowledge.

2. **Administrative Claim under the IDEA.** Prior to this suit, Plaintiffs filed a
special education due process hearing request against the District on March 2, 2015. The District
and Plaintiffs engaged in settlement negotiations in relation to that request in February and
March 2016. As part of those negotiations, the District made a settlement proposal that included

1 a full release of claims by Plaintiffs. It is standard practice to request a full release of claims in
2 settlement negotiations that include some consideration being provided by the non-releasing
3 party. Those negotiations were unsuccessful and the case proceeded to hearing.

4 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE
5 OF WASHINGTON THAT THE FOREGOING STATEMENT IS TRUE AND CORRECT.

6 Dated this 27th day of July, 2017.
7

8 /s/ David T. Hokit
9 DAVID HOKIT, WSBA #13512